



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

Benzene Coke By-Product NESHAP
Facility Notification Letter

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 13, 1989

P-115 239 416

Mike Thomas
LTV Steel Company, Inc.
11600 South Burley Avenue
Chicago, IL 60617

EPA Region 5 Records Ctr.



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Dear Mr. Thomas:

Pursuant to Section 112 of the Clean Air Act, as amended (42 U.S.C. 1857 et seq.), the Administrator of the United States Environmental Protection Agency promulgated National Emission Standards for Hazardous Air Pollutants, Benzene Emissions from Coke By-Product Recovery Plants on September 14, 1989. We believe that your company may have source(s) affected by this rulemaking.

The purpose of this letter is to notify the owners or operators of potentially affected sources of the requirements of the regulations. A copy of these regulations (40 CFR 61, Subpart L) is enclosed as Enclosure 1. Also enclosed is a copy of Subpart A - General Provisions of 40 CFR 61, National Emission Standards for Hazardous Air Pollutants (Enclosure 2) and Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) as Enclosure 3. The requirements include:

Prohibited Activities

1. No owner or operator shall construct any new source or modify any existing source to which a standard is applicable after the effective date of the regulations (September 14, 1989) without first obtaining approval from this agency which has authority to implement 40 CFR 61, Subpart L.
2. No owner or operator shall operate any new source (i.e., one whose construction or modification commenced after July 28, 1988) in violation of any applicable standard after the effective date of the regulations.
3. No owner or operator shall operate any existing source (i.e., one whose construction or modification commenced on or before July 28, 1988) in violation of any applicable standard 90 days after the effective date of the regulations, except under a waiver of compliance. New sources that began operation prior to the effective date are not eligible for a compliance waiver and, as noted in Item 2 above, may not be operated in violation of Subpart L after the effective date.
4. No owner or operator shall fail to report or conduct performance tests as required by these regulations.

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Emission Standards, and Monitoring and Reporting Requirements

Emission standards for the affected sources covered by the regulations are outlined in 40 CFR 61.132 through 61.135. Section 61.132 contains standards for process vessels, storage tanks and tar-intercepting sumps at furnace coke and foundry coke by-product recovery plants. In addition, the standards in 61.132 also cover benzene storage tanks, BTX (benzene, toluene, xylene) storage tanks, light-oil storage tanks, and excess ammonia-liquor storage tanks at furnace coke by-product recovery plants. The emission standards require the installation of gas blanketing systems that duct all benzene emissions to a destruction or recovery device that has no detectable emissions, as indicated by visual inspection and as indicated by a volatile organic compound analyzer reading of less than 500 ppm above background as measured during periodic inspections.

Under the provisions of 40 CFR 61.132 each source owner or operator shall, on a semi-annual basis, use EPA Method 21 to verify that the connections and seals on each control system are being operated with no detectable emissions and shall inspect each source for visible defects such as gaps or tears in the source or the ductwork to the control device. On an annual basis, owners or operators shall inspect the control system for abnormalities such as blocked or plugged lines, sticking valves or other defects that could affect the control system's effectiveness. When leaks or control system defects are detected during these required periodic inspections, repairs must be initiated within 5 days and be completed within 15 days.

Emission standards for light-oil sumps are contained in 40 CFR 61.133. These standards require that the surface area of each sump be completely enclosed and prohibit the venting of steam or other coke by-product gases to light-oil sumps. Any access hatches installed on light-oil sumps must include a cover or lid sealed with a gasket and any vents installed on light-oil sumps must be equipped with a water seal, pressure relief device, or vacuum-relief device. Inspections of gaskets for detectable emissions are required semi-annually and at any time seals are disturbed by removal of a cover. Any leaks detected during these inspections must be repaired within 15 days and a first attempt at repairs must be made within 5 days.

Emission standards for naphthalene processing, final coolers, and final-cooler cooling towers are contained in 40 CFR 61.134, and no (i.e., zero) emissions are allowed from these affected facilities.

Emission standards for process equipment in benzene service are contained in 40 CFR 61.135. This Section requires that owners or operators of such process equipment at coke by-product recovery plants implement a benzene leak detection and repair program using procedures promulgated at 40 CFR 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources). Monitoring for equipment leaks must be conducted quarterly on exhausters, monthly on pumps and valves, and within 5 days of a pressure release or a potential leak on pressure relief devices and connectors. Any leaks detected must be repaired within 15 days, and a first attempt at making repairs must be made within 5 days of detection.



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Reporting requirements for sources subject to Subpart L are promulgated at 40 CFR 61.138. Owners and operators of existing sources and new sources that started up prior to the effective date of the regulations are required to submit an initial compliance report by December 13, 1989, for all sources for which a waiver of compliance (see below) is inappropriate or has not been requested. This initial report must satisfy the reporting requirements of 40 CFR 61.10 and 40 CFR 61.138(e).

On a semi-annual basis, beginning June 13, 1990, source owners or operators are required to begin submittal of reports addressing the number of control system defects or leaks detected and repaired under the provisions of 40 CFR 61.132 through 61.135.

Waivers of Compliance

Owners or operators of existing sources that are unable to operate in compliance with any standard may request a waiver of compliance for a period not exceeding two years from the effective date of the standard. Some of the Subpart L benzene requirements are in the form of work practice standards (e.g., leak detection and repair programs), and waivers from these standards are not appropriate since these requirements can be implemented within 90 days of the effective date of the regulations. However, certain provisions may require retrofitting of controls and requests for waivers will be reviewed on a case-by-case basis. Any waiver request shall be submitted in writing by December 13, 1989, and shall include the information specified at 40 CFR 61.10(b).

Please note that any failure to meet the requirements of the regulations is a violation of the Clean Air Act for which civil penalties of up to \$25,000 per day of violation can be assessed and recovered. If you do not own or operate any of the affected sources described in the regulations, please notify our office in writing. If you have any questions concerning procedures or the regulations, please contact Anton M. Telford of my staff at 782-2113. Please address all submittals (letters, initial reports, waiver requests, etc.) to this office (ATTN: Terry Sweitzer).

Sincerely,

Terry A. Sweitzer, P.E.
Manager, Permit Section
Division of Air Pollution Control

TAS:AMT:jmm/0781K/32-34

Enclosures (3)

cc: Chief, Air Compliance Branch, U.S. EPA, Region V (SAC-26)